

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

LIBERTY RESOURCES, INC.; DISABLED
IN ACTION OF PENNSYLVANIA, INC;
PHILADELPHIA ADAPT; TONY BROOKS;
LIAM DOUGHERTY; FRAN FULTON; and
LOUIS OLIVO;

Plaintiffs,

-against-

THE CITY OF PHILADELPHIA,

Defendant.

Case No. 2:19-cv-03846

**DECLARATION OF JONATHAN
FULTON IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION *IN LIMINE***

Judge: Honorable Harvey Bartle III

I, Jonathan Fulton, hereby declare:

1. I make this declaration based on my personal knowledge, and if called to testify, I could and would do so as follows:

2. Plaintiff Fran Fulton is my mother.

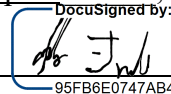
3. I live in Philadelphia, Pennsylvania.

4. On October 29, 2021, I visited the intersection of 17th Street and Ludlow Street with my mother and took a photograph of curb ramps on the northwestern and southwestern corners and the crosswalk between those ramps. That photograph is attached hereto as Exhibit A, Bates stamped P001895.

5. On October 27, 2021, I visited the intersection of Juniper Street and Walnut Street with my mother and took a photograph of curb ramps on the northwestern and northeastern corners and the crosswalk between those ramps. That photograph is attached hereto as Exhibit B, Bates stamped P001896.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 12, 2022 in Philadelphia, Pennsylvania.

DocuSigned by:

95FB6E0747AB4AB...

Jonathan Fulton

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LIBERTY RESOURCES, INC, et al.,

Plaintiffs,

v.

THE CITY OF PHILADELPHIA

Defendant

Case No. 2:19-cv-03846

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **DECLARATION OF JONATHAN FULTON IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT'S MOTION *IN LIMINE*** is hereby filed electronically and available for viewing and downloading from the ECF system; and has been served on Defendant's counsel by ECF's electronic notification today, January 12, 2022.

By: 

Meredith J. Weaver*

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DISABILITY RIGHTS ADVOCATES

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